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**From:** Hillyer, Kirsten [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HILLYER, KIRSTEN]  
**Sent:** 8/24/2018 1:42:36 PM  
**To:** Sandra Carey [sandracarey@imoa.info]  
**Subject:** RE: Enquiry from the International Molybdenum Association re 40 CFR Part 257 - Mo GWPS MCL value

Hello Sandra,

My apologies for the slow response. I received your voicemails. Unfortunately I cannot return your phone calls due to restrictions on outgoing internal calls on the phone at my desk.

From your email and the voicemails, I understand that you have questions over the groundwater protection standard (GWPS) level that was established in the CCR Phase One Part One July 2018 final rule for molybdenum. The level established in this rule is not a Maximum Contaminant Level (MCL) for molybdenum. It is a protection standard that is used for determining if the CCR disposal unit is leaking and requires corrective action. This level was established using methods set out in a few guidance documents for determining groundwater protection standards. I have included a link below to the guidance document used for calculation of this risk-based GWPS for your convince. Additional guidance on determining GWPS can be found in the supporting documents section of the docket on regulations.gov. In the 2015 CCR rule, the groundwater protection standards were set at the MCL and if an MCL is not established for the constituent (like in the case for molybdenum) background levels were used instead. However background levels are not necessarily protective of human health therefore we have established a risk-based alternative level to be used instead.

Link to guidance: <https://www.epa.gov/risk/risk-assessment-guidance-superfund-rags-part-b>

Please let me know if you have any further questions. I can receive incoming international phone calls on my desk phone so if you would like to speak over the phone, we can set up a time to do so.

Kirsten Hillyer  
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U.S. Environmental Protection Agency  
Office of Resource Conservation & Recovery (ORCR)  
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**From:** Sandra Carey [mailto:sandracarey@imoa.info]  
**Sent:** Thursday, August 16, 2018 5:11 PM  
**To:** Hillyer, Kirsten <hillyer.kirsten@epa.gov>  
**Subject:** Enquiry from the International Molybdenum Association re 40 CFR Part 257 - Mo GWPS MCL value

Hello Kirsten

I'm just following up with a brief Email after leaving you a couple of voicemails today. I called regarding the GWPS Maximum Contaminant Level of 100 µg/L for molybdenum that has been set as part of EPA finalizing revisions to the 2015 regulations for the disposal of CCR in landfills and surface impoundments. I have obtained the information from this webpage:

<https://www.regulations.gov/document?D=EPA-HQ-OLEM-2017-0286-2227>

Here at the International Molybdenum Association we would be most interested to understand the detail of which scientific data have been taken into consideration when deriving the 100 µg Mo/L MCL, and the derivation methodology that resulted in that value. Could you please direct us to where we may access that detailed information.

Thanks in advance for your kind response.

Sandra

**Sandra Carey**

HSE Executive



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